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Minerals Management Service
381 Elden Street
MS 4042
Herndon VA, 20164

RE: Comments on the notice of intent to prepare an EIS for the Cape Wind offshore wind energy project

To whom it may concern:

Greenpeace USA submits these comments in response to the May 30, 2006 notice in the Federal Register (71 FR 30694) on the Mineral Management Services (MMS) notice of intent to prepare an EIS for the Cape Wind offshore wind energy project.

Background and Introduction:

Greenpeace is an independent, campaigning organization that uses non-violent, creative confrontation to expose global environmental problems, and force solutions for a green and peaceful future. Greenpeace's goal is to ensure the ability of the Earth to nurture life in all its diversity.

We write to support your effort to ensure that the Cape Wind project receives due consideration in a timely manner and that the many positive attributes of the project are given adequate consideration in the draft environmental impact statement (DEIS). The November 2004 DEIS performed by the Army Corps of Engineers did a adequate job of surveying the potential harm to wildlife and the Nantucket Sound ecosystem and identified no major lasting environmental impacts. We advise that MMS continue to weigh suggestions of potential environmental harm accordingly, with an open mind, thoughtful analysis and response, balanced with the understanding that many of these objections are a smoke screen from those parties who want to see the project cancelled for aesthetic reasons. We also urge MMS to perform and complete these reviews in a timely manner, adhering to the timeline laid out in 2006.

Need and benefits of the offshore wind energy development:

Greenpeace believes that offshore wind offers an immediate, clean, safe and effective answer to both global warming and energy security. By its very nature wind is indigenous and limitless. It is a completely safe and resilient energy supply, not dependent on uncertain fuel supplies or rising energy prices.

Given the imminent threat global warming poses to our planet, we believe increased offshore wind energy production has enormous potential as a solution to this growing crisis. Our country needs to swiftly develop new wind energy sources, unless there is specific evidence of environmental harm. Greenpeace has been at the center of offshore wind development in Europe over the past decade. We have closely

monitored offshore projects in Denmark, the United Kingdom and the Netherlands. While these governments have put in place various supports for offshore wind power to stimulate its development, our government, with the exception of the Production Tax Credit (PTC), has thus far failed to do so. In each of these countries, these projects have each raised a similar debate to the discussion around the Cape Wind project. The ecological concerns raised by wind power skeptics in Europe have not born out and we do not expect the concerns raised in the United States to endure either.

Greenpeace has a 35-year history of protecting the world's oceans from dumping, over fishing and other exploitation. As such, we did not take our decision to support the Cape Wind farm lightly. It is also our belief, backed by studies of this and other offshore wind projects in Europe, that any environmental impacts caused by installing these turbines offshore are minor, especially when compared to the truly profound impacts of global warming on the oceans, estuaries and coastal lands. From the melting ice pack of the polar regions to the bleached coral reefs of the tropics to the disruption of ocean currents, global warming is already directly harming ocean ecosystems.

At a time when numerous off shore liquid natural gas (LNG) facilities are proposed for the region and oil companies continue to push for opening more ocean bottom to drilling with little regard for their impact on the marine ecosystem, we find ourselves in an enviable position of supporting truly renewable sources of energy such as offshore wind farms.

Offshore wind is a big step in the right direction and can contribute quickly to a tangible reduction in global warming pollution.

In addition, by supporting offshore wind we will:

- Avoid pollution and health impacts from coal and oil plants – specifically by reducing the amount of mercury entering the marine food chain primarily from coal burning power plants. Mercury is a known neurotoxin found in larger fish such as tuna and swordfish. Mercury contamination is a particular concern for women of childbearing years and their small children because mercury exposure in the womb can cause neurological damage and other health problems in children;
- Stem the tide of oil spills, drillings, leaking platforms, rising water temperatures that affect fish habitat, rising sea levels that threaten communities throughout the world, and other adverse effects of our continued reliance on non-renewable fossil fuels;
- Help curb the development of offshore LNG facilities – another form of non-renewable fossil fuel – proposed for the region. Furthermore, the safety issues associated with hosting LNG facilities present a whole host of navigation, access to fishing grounds, and other safety and economic issues; and,
- Lead the world in developing clean alternative sources of energy.

Specifics benefits to the New England Region:

At peak output the Cape Wind project would offset about 113 million gallons of imported oil per year and provide power to 500,000 homes. To put it into perspective, the 98,000 gallons of oil from the 2003 oil spill in Buzzards Bay would, on average, only power the Canal plant located on Cape Cod for 2 hours and 24 minutes. According to the Army Corps' DEIS the Cape Wind project will offset one million tons of carbon dioxide every year and will be a huge step toward meeting the goals that Massachusetts has set out under the Climate Change Action Plan in 2001.

Alternative sites:

One of the primary considerations in choosing a location for a wind energy project is how strong the winds are. The US Department of Energy and a number of private companies have developed maps showing the distribution of available wind energy throughout the United States. In the New England area, the best winds are found around the coast of Cape Cod and in the White Mountains of New Hampshire and Maine. If the wind farm were located on-shore, the power production would decrease by a minimum of 30% because offshore wind is stronger and more consistent. The shallow water of Horseshoe Shoal is the best location for the construction of the wind turbines and the power can easily be connected to the electrical grid. Deep-water technology has a promising future for energy production but does not currently exist on a commercial scale. Given the stark urgency of global warming we cannot wait years for this technology to come online.

Navigation:

The shallow nature of Horseshoe Shoal also means major shipping channels and ferry routes will not be affected. Recreational and commercial boaters will still have full access to the Shoal since the turbines will be about one third of a mile apart for easy navigation. According to the DEIS prepared by the Army Corps of Engineers the FAA has ruled the wind farm will not impede aviation navigation.

Wildlife Concerns:

It is important for proposed wind projects to conduct a thorough analysis of the risk to bird life as part of the environmental impact assessment. Studies show that for every 10,000 bird fatalities, wind turbines cause less than one. For comparison, cats cause about 10% of bird deaths and more than half are caused by collisions with buildings or windows. Monitoring of existing wind farms suggests that with proper location and construction, there is no biologically significant impact on bird populations.

Economic Concerns:

There is no credible evidence to suggest that offshore wind energy projects deter tourists, indeed many wind farms are actually tourist attractions. For example, in Swaffham, Norfolk, over 50,000 tourists have climbed the wind turbine tower to see the spectacular views from the top of its viewing platform. In Denmark, many tour agencies run boat trips to take visitors to see the offshore wind farm at Middelgrunden, near Copenhagen and here at home, the wind farm in Searsburg, Vermont consistently fills educational tours of its facilities.

The fishing community on Cape Cod has voiced concern that the wind farm will deter fishing. The DEIS performed by the Army Corps concluded that the only fishing that would be impeded would be bottom trawling by mobile gear fisherman who tow 1,000 foot nets behind their boats to drag along the ocean



floor. This type of fishing is detrimental to the marine environment. The wind energy project will protect Nantucket Sound from this type of destructive fishing.

Although we understand the fishing communities' concerns regarding the precedence such projects could set for future privatization and industrial development of the coastal regions, we believe by working together we can ensure ocean policies limit marine based industries to truly renewable and ecologically responsible activities that take into account the need to perpetuate the small-scale, ecologically minded fishing industry's economic viability.

Conclusion: Mineral Management Services should conduct a thorough and timely review for the Cape Wind project.

Now is the time to take every action available to slow the impacts of global warming. In fact we should have started long ago. Offshore wind is a big step in the right direction and can contribute quickly to a tangible reduction in global warming pollution. In addition, as was calculated in the Army Corps' DEIS, the avoided pollution and health impacts from coal and oil plants make wind power the picture of true social progress. From local jobs to clean energy, this project is right for America and right for the Cape. We hope Mineral Management Services will continue on its current path of thoroughly analyzing this project to ensure it's ecological, economic and health benefits for the region. In years to come, the people of Massachusetts will be proud of this contribution to the clean energy revolution.

Sincerely,

Katherine Smolski
Energy Campaigner
Greenpeace USA